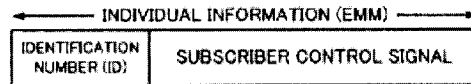


**REMARKS**

Claims 27-42 are pending. Claims 27 and 36 are in independent form.

In the Office action mailed November 16, 2007, the Examiner contended that "[t]he pairing [of a single unique identifier] with the subscription control data is the mapping with the group data." Such a pairing is illustrated in FIG. 2 of U.S. Patent No. 6,622,303 to Yamashita (hereinafter "Yamashita"), which is now reproduced for the sake of convenience.

***Fig. 2***



As discussed in the response filed October 10, 2007, the EMM information is composed of a (single) identification number and a (single) subscriber control signal. See, e.g., Yamashita, col. 4, line 47-49. The identification number is a unique number assigned to each subscriber. See, e.g., *id.*, col. 4, line 49-52; line 53-56.

Applicant respectfully submits that the pairing in Yamashita's EMM information neither describes nor suggests the maps recited in claims 27 and 28. In particular, claim 27 relates to a method that includes compiling and transmitting first and second maps that each associate "identifiers of

clients ... with identifiers of groups of clients." Claim 26 relates to broadcast system that includes a map that associates "identifiers of clients ... with identifiers of groups of two or more clients." In claim 26, such a map is transmitted by a transmitter of a head end, received by a receiver of each of a collection of clients, and used by logic to identify one or more groups to which a client belongs.

Applicant respectfully submits that the single identification number in Yamashita's EMM information cannot reasonably be considered to constitute "identifiers of clients." Each identification number in Yamashita's EMM information uniquely identifies a single receiving unit. Thus, Yamashita's EMM information does not include "identifiers," much less "identifiers of clients."

If the Examiner persists in maintaining the rejection, applicant respectfully request that the Examiner set forth the basis on which the Examiner believes that a single unique identifier of a single client constitutes "identifiers of clients," as recited.

Finally, as discussed in the response filed October 10, 2007, the distinction between Yamashita's single unique identifier in EMM information and the recited subject matter is not trivial. As discussed in para. [0002] of the specification,

at certain traffic levels, individually addressing client-specific messages can be cumbersome and time-consuming for a host and can reduce the available bandwidth. In contrast, Applicants have recognized that group membership maps can be updated at a head end and subsequently transmitted to client devices. *See also specification*, para. [0020].

Since Yamashita does not involve maps that associate identifiers of clients in a digital cable broadcast system with identifiers of groups, Yamashita neither describes nor suggests the subject matter recited in claims 27 and 36. Accordingly, the anticipation rejections are improper and Applicant respectfully requests that the rejections of claims 27, 36, and the claims dependent therefrom be withdrawn.


It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any

claim does not necessarily signify concession of unpatentability  
of the claim prior to its amendment.

No fees are believed due at this time. Please apply any  
charges or credits to Deposit Account No. 06-1050.

Respectfully submitted,

Date: January 16, 2008

  
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